

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
EASTERN DIVISION**

**IN RE:** )  
**DEE FORD'S WEST, LLC,** )                           **CHAPTER 11, SUBCHAPTER V**  
**Debtor.**                 )                           **CASE NO.: 24-40320**

**APPLICATION FOR EMPLOYMENT OF PROFESSIONAL PERSONS**

**COMES NOW** the Debtor, by and through the undersigned attorney, and submits the following Application to Employ Lloyd W. Gathings as special counsel for the Debtor:

1. Debtor desires to employ attorney Lloyd W. Gathings of Gathings Law to represent him in a civil suit styled *Dee Ford's West, LLC v. Mesa Underwriters Specialty Insurance Co.*, Case No. 1-24-cv-00946, in the District Court for the Northern District of Alabama.
2. Debtor has selected this attorney for his extensive litigation experience and results.
3. Debtor has paid no fees to the attorney. The attorney expects to be paid on a contingency basis or to be paid whatever fees might be awarded by the Court under any relevant fee-shifting statutes, subject to approval by the bankruptcy court.
4. Lloyd W. Gathings has no connections with the Debtor, creditors, other parties in interest or with their respective attorneys and accountants, or with the Bankruptcy Trustee or any person employed in the office of the Bankruptcy Trustee.
5. Debtor believes the appointment of Lloyd W. Gathings would be in the best interest of the Debtor and the estate.

**WHEREFORE**, the premises considered, the undersigned requests that the Court approve the employment of Lloyd W. Gathings to represent Debtor as special attorney in the civil suit and that it grant such further or different relief as it deems just and proper.

Respectfully submitted this 19th day of September, 2024.

*/s/ J. Gabriel Carpenter*

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Harvey B. Campbell, Jr. and  
J. Gabriel Carpenter  
*Attorneys for Debtor*  
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### **CERTIFICATE OF SERVICE**

I hereby certify that on September 19, 2024, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System and served a copy of the foregoing by U.S. First Class Mail, postage prepaid, properly addressed to the creditors listed in the attached mailing matrix, and to the following via electronic mail:

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Attorney for Thomas Lavigne  
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*/s/ J. Gabriel Carpenter*

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J. Gabriel Carpenter  
*Attorney for Debtor*

Label Matrix for local noticing

1126-1

Case 24-40320-JJR11

NORTHERN DISTRICT OF ALABAMA

Anniston

Thu Sep 19 14:42:09 CDT 2024

Steering Committee

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The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d) Destiny R. Hare

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End of Label Matrix

Mailable recipients 22

Bypassed recipients 2

Total 24